

**EXHIBIT A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et  
al.*

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 23612 and 23621

**[PROPOSED] ORDER GRANTING URGENT CONSENSUAL MOTION FOR  
FURTHER EXTENSION OF DEADLINES REGARDING MOTION  
REQUESTING PAYMENT OF SEVERANCE DAMAGES**

Upon the *Urgent Consensual Motion for Further Extension of Deadlines Regarding Motion Requesting Payment of Severance Damages* (Docket Entry No. \_\_\_\_ in Case No. 17-3283, the “Urgent Motion”);<sup>2</sup> and the Court having found it has subject-matter jurisdiction over this matter pursuant to PROMESA section 306(a); and it appearing that venue in this district is proper

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Urgent Motion.

pursuant to PROMESA section 307(a); and the Court having found the Debtor provided adequate and appropriate notice of the Urgent Motion under the circumstances and no other or further notice is required; and upon the record herein, after due deliberation thereon, the Court having found good and sufficient cause exists for the granting of the relief as set forth herein:

1. The Urgent Motion is **GRANTED** as set forth herein.
2. The Scheduling Order shall be modified as provided herein.
3. The following briefing schedule shall apply for filing responsive pleadings to the

Motion:

- The deadline for parties to file an opposition to the Motion shall be **April 7, 2023**.
- The deadline for the Movant to file a reply to all oppositions and responses shall be **April 14, 2023**.

4. The Court will thereafter take the Motion on submission unless it determines otherwise.
5. The Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.
6. This Order resolves Docket Entry No. \_\_\_\_\_ in Case No. 17-3283.

Dated: \_\_\_\_\_, 2023.

SO ORDERED:

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HONORABLE LAURA TAYLOR SWAIN  
United States District Judge